

SB 1104 IHSS/PCSP QA INITIATIVE OVERVIEW

INTRODUCTION

- **THE CALIFORNIA DEPARTMENT OF SOCIAL SERVICES (CDSS) ISSUED ALL COUNTY INFORMATION NOTICE (ACIN) NO. I-69-04 TO:**
 - **PROVIDE INFORMATION REGARDING THE IN-HOME SUPPORTIVE SERVICES/PERSONAL CARE SERVICES PROGRAM (IHSS/PCSP) QUALITY ASSURANCE (QA)**
 - **PROVIDE PROGRAM INTEGRITY PROVISIONS OF FISCAL YEAR (FY) 2004/05 IN ACCORDANCE WITH SENATE BILL (SB) 1104, CHAPTER 229, STATUTES OF 2004**

INTRODUCTION (continued)

- **SB 1104 OUTLINED A NUMBER OF ACTIVITIES TO BE PERFORMED BY CDSS, CALIFORNIA DEPARTMENT OF HEALTH SERVICES (CDHS), AND THE COUNTIES SUCH AS:**
 - **STATE AND COUNTY STAFFING AUGMENTATIONS SPECIFICALLY FOR QA ACTIVITIES**
 - **FUNDING TO ESTABLISH AN ONGOING STATE TRAINING COMPONENT FOR IHSS/PCSP WORKERS**
 - **FUNDING FOR SPECIFIED SYSTEMS CHANGES TIED TO QA AND PROGRAM INTEGRITY**

STAKEHOLDER MEETINGS

- **SB 1104 REQUIRES THE STATE TO CONVENE PERIODIC MEETINGS WITH COUNTIES AND PROGRAM STAKEHOLDERS TO:**
 - **PROVIDE INFORMATION TO STAKEHOLDERS AND RECEIVE INPUT FROM STAKEHOLDERS ON THE REQUIRED IHSS QA PROGRAM INTEGRITY AND PROGRAM CONSISTENCY EFFORTS BEING DEVELOPED AND IMPLEMENTED BY CDSS, CDHS, AND THE COUNTIES**

STAKEHOLDER MEETINGS (continued)

- **IHSS QA PROGRAM SUBJECT MATTER REQUIRED FOR STAKEHOLDER MEETINGS INCLUDE:**
 - **HOURLY TASK GUIDELINES**
 - **VARIABLE ASSESSMENT INTERVALS**
 - **ALTERNATIVES TO A FULL REASSESSMENT FOLLOWING DISCHARGE FROM A MEDICAL FACILITY**
 - **STANDARDIZED PROTECTIVE SUPERVISION MEDICAL CERTIFICATION FORM**
 - **STATEWIDE COUNTY TRAINING PROGRAM**
 - **VERIFICATION OF CLIENT RECEIPT OF SERVICES**

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QA INITIATIVE OBJECTIVES

IMPROVE THE QUALITY OF IHSS NEEDS ASSESSMENTS

- **DEVELOP AND PROVIDE ONGOING STATEWIDE TRAINING AND FORMAL MONITORING AT THE STATE AND LOCAL LEVEL**
- **STATEWIDE TRAINING PROGRAM FOR COUNTY IHSS STAFF TO INCLUDE:**
 - **THE IHSS UNIFORMITY SYSTEM**
 - **RULES AND POLICIES GOVERNING NEEDS ASSESSMENTS**
 - **EMERGING IHSS QA AND PROGRAM INTEGRITY POLICIES AND PROCEDURES**

IMPROVE THE QUALITY OF IHSS NEEDS ASSESSMENTS (continued)

- **COUNTIES REQUIRED TO PERFORM IHSS PROGRAM INTEGRITY CASE REVIEW ON A ROUTINE BASIS**
- **STATE REQUIRED TO MONITOR COUNTY QA ACTIVITY**
- **VARIABLE REASSESSMENT INTERVALS TO ALLOW COUNTIES TO BETTER FOCUS RESOURCES WHERE COSTS CAN BE AVOIDED, SUCH AS:**
 - **WAITING LONGER TO REASSESS STABLE CASES**
 - **ALLOWING RESOURCES TO BE APPLIED TO CASES THAT MIGHT IMPROVE WITHIN 12 MONTHS**

CREATE IHSS PROGRAM PROCESS CONSISTENCY

- **STANDARD STATEWIDE COUNTY IHSS STAFF TRAINING**
- **DEDICATED SPECIALIZED COUNTY QA AND PROGRAM INTEGRITY UNIT OR FUNCTION**
- **HOURLY TASK GUIDELINES**
- **PROGRAM PROVIDER PARTICIPATION STANDARDS AND ENROLLMENT PROCESS**

CREATE IHSS PROGRAM PROCESS CONSISTENCY (continued)

- **STATEWIDE PROTECTIVE SUPERVISION
MEDICAL CERTIFICATION FORM**
- **CONSISTENT STATE/COUNTY QA AND
PROGRAM INTEGRITY PROTOCOLS AND
PROCEDURES**
- **UPDATED PROGRAM REGULATIONS**

DETECT AND PREVENT IHSS PROGRAM FRAUD

- **CDSS AND COUNTIES REQUIRED TO PUBLICIZE AVENUES FOR REPORTING SUSPECTED FRAUD AND ABUSE TO THE STATE**
- **EACH COUNTY REQUIRED TO HAVE A DEDICATED IHSS QA FUNCTION AND CARRY OUT SPECIFIED FRAUD DETECTION AND PREVENTION ACTIVITIES**

ASSURE IHSS PROGRAM INTEGRITY

- **IHSS PROVIDER PARTICIPATION STANDARDS AND REQUIREMENTS**
- **ALL PROGRAM PROVIDERS REQUIRED TO ENROLL IN THE PROGRAM**
- **STANDARD PROCEDURES TO IDENTIFY AND RECOVER INAPPROPRIATE IHSS PROGRAM PAYMENTS USING APPROPRIATE DUE PROCESS AND APPLICABLE LABOR LAWS**

ASSURE IHSS

PROGRAM INTEGRITY (continued)

- **STANDARD PROCESSES TO IDENTIFY AND RECOVER IHSS PROGRAM PAYMENTS FROM LIABLE THIRD PARTIES**
- **ROUTINE ERROR STUDIES AND IHSS/MEDI-CAL PAID SERVICES DATA MATCHES TO IDENTIFY POTENTIALLY INAPPROPRIATE OR DUPLICATE PAYMENTS**
- **LEGAL DEFINITION OF IHSS “OVERPAYMENTS” TO PROVIDE STATE/COUNTY LEGAL AUTHORITY TO RECOVER OVERPAYMENTS**

WORKGROUP/COMMITTEE REQUIREMENTS

IMPLEMENTATION MEETINGS

- **IHSS/MEDI-CAL CLAIMS DATA MATCHES**
- **ANNUAL ERROR RATE STUDY**
- **VARIABLE ASSESSMENT INTERVALS**

IMPLEMENTATION WORKGROUPS

- **STATEWIDE ASSESSMENT TRAINING PROGRAM**
- **HOURLY TASK GUIDELINES**
- **PROVIDER PARTICIPATION, INCLUDING ENROLLMENT FORM DEVELOPMENT, EXCLUSION RULES AND PROCEDURES, REPORTING PROCESSES, NOTICE AND DUE PROCESS**
- **STANDARD PROTECTIVE SUPERVISION MEDICAL CERTIFICATION FORM**
- **IHSS REGULATIONS REVISION**

ONGOING STATE/COUNTY OPERATIONS COMMITTEE

- **STATE/COUNTY METHODS, PROTOCOLS, PROCEDURES AND INSTRUCTIONS:**
 - **POLICIES AND PROCEDURES GOVERNING STATE MONITORING OF COUNTY QA PROGRAMS**
 - **IHSS/MEDI-CAL DATA MATCH DEVELOPMENT, COUNTY ACTIONS ON DATA MATCH DISCREPANCIES**
 - **COUNTY IDENTIFICATION OF THIRD PARTY LIABILITY FOR IHSS**
 - **LOCAL PROGRAM MONITORING BY COUNTIES TO DETECT/PREVENT FRAUD AND MAXIMIZE RECOVERY OF OVERPAYMENTS**

ONGOING STATE/COUNTY OPERATIONS COMMITTEE (continued)

- **STATE/COUNTY INFORMING OF RECIPIENTS, PROVIDERS AND THE GENERAL PUBLIC OF THE MEDICAL TOLL-FREE LINE AND CDHS WEBSITE FOR REPORTING SUSPECTED FRAUD**
- **JOINT STATE/COUNTY CASE REVIEWS, INCLUDING RANDOM POST-PAYMENT CLAIMS REVIEWS**
- **COLLABORATIVE WORK WITH CDHS TO IDENTIFY, REFER, INVESTIGATE, AND TAKE ADMINISTRATIVE ACTION ON OR PROSECUTE FRAUD**
- **OVERPAYMENT IDENTIFICATION, NOTICE, DUE PROCESS AND RECOVERY**

STAKEHOLDER MEETING SUBCOMMITTEE

- **METHODS FOR VERIFYING RECIPIENT RECEIPT OF SERVICES**
- **ALTERNATIVES TO A FULL REASSESSMENT TO AUTHORIZE A TEMPORARY SERVICE INCREASE FOLLOWING DISCHARGE**
- **WEBSITE POSTINGS OF IHSS INFORMATION**

PRIORITIES

- **STATEWIDE SOCIAL WORKER ASSESSMENT TRAINING PROGRAM**
- **IHSS REGULATIONS REVIEW AND REVISION**
- **HOURLY TASK GUIDELINES**
- **PROVIDER PARTICIPATION STANDARDS AND ENROLLMENT PROCESS**
- **COUNTY QA EVALUATION AND INTEGRITY CASE REVIEW PROCESS**
- **ANTI-FRAUD/OVERPAYMENT ACTIONS**

IMPLEMENTATION

- **ALL QA PROVISIONS OF SB 1104
ANTICIPATED TO BE IMPLEMENTED BY
JUNE 30, 2006.**